

I am very concerned about the possibility of the acceptance of IBOC digital broadcasting in the existing FM broadcast band. From the information I have been able to gather, including demonstrations at the last two NAB Conventions, it offers the consumer very little extra benefit. While IBOC can sound quite good, it is unlikely that the average consumer will notice much improvement in quality over analog FM (AM is another story). This is especially true in noisy automotive environments, but it will also be a factor for those who use inexpensive radios, either portable or table models, that are intended for casual listening. They won't be able to hear any improvement.

For the many people who will still use analog radios for years to come, IBOC will simply cause them many reception problems. After all, it's very hard to believe that everybody will replace their clock radio with a new, more expensive, digital version, just so they can wake up in the morning. It will take many years to implement a total change-over, especially when there is no compelling reason to do so.

Since the IBOC signal does not fit inside the stations allotted bandwidth, it will cause interference in some instances. Why do we want to do something that we are pretty sure will cause problems down the road? When the newly assigned LPFM stations take to the airways, the situation will likely get worse. These new stations will be difficult for many to receive even under good conditions. With a near-by 100,000 watt IBOC neighbor, their signal could become totally unlistenable for many of the people that this service was intended to address.

If the FCC had a major concern about second adjacent LPFM stations causing interference, then IBOC should really be a huge concern. It is very difficult to argue that one type of possible interference is "unacceptable," while another type of interference is "OK." Like the song says, "It's Got To Be This Or That." The only ones who will win from IBOC's implementation will be the vendors of the new equipment and the broadcasters who can afford to upgrade their equipment so they can market portions of their digital signal as alternative revenue sources. Somehow, that doesn't strike me as being in the public interest.

While I have no objection to the implementation of Digital Radio, I sincerely believe this is the wrong approach. Digital broadcasting should be assigned to new frequencies, such as the European and Canadian Eureka system, or if a new US digital system is to be established in the conventional FM broadcast band, then it should comply with current bandwidth regulations.